

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

MARY VAN BRUNT-PIEHLER,

*Plaintiff,*

v.

ABSOLUTE SOFTWARE, INC., ABSOLUTE  
SOFTWARE CORPORATION, GEOFF HAYDON,  
THOMAS KENNY, and TODD AWTRY,

*Defendants.*

Civil Action No.

16-cv-6313

PLAINTIFF'S STATEMENT REGARDING EXPERT TESTIMONY

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*Attorneys for Plaintiff*

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Of Counsel: J. Nelson Thomas  
Jonathan W. Ferris

### EXPERT TESTIMONY

Plaintiff identifies the following experts that may provide testimony of behalf of plaintiff in this action:

1. **Rona Wexler:** Ms. Wexler is the President and Founder of Wexler Vocational and Career Consulting LLC, New York, NY. Ms. Wexler performed a vocational assessment to determine plaintiff's employment capabilities, job placement options in full-time employment, and reasonable expectation to achieve optimal remunerative earning capacity in her relevant labor market. Ms. Wexler's CV and her expert report (including the material relied upon in her report) will be provided with plaintiff's trial exhibits. Plaintiff has complied with her expert disclosure requirements under Fed. R. Civ. P. 26(a)(2) and (b)(4).

2. **Dr. Steven Shapiro:** Managing Partner and Principal Expert of Analytic Resources, LLC, is Professor of Finance and Director of the Risk Management Center at New York Institute of Technology. Dr. Shapiro received his B.A. in Economics and Mathematics from the University of Virginia and his M.A. and Ph.D. in Economics from Georgetown University. Dr. Shapiro performed detailed calculations regarding the value of the lost compensation of plaintiff. Dr. Shapiro's qualifications and his expert report (including the material relied upon in his report) will be provided with plaintiff's trial exhibits. Plaintiff has complied with her expert disclosure requirements under Fed. R. Civ. P. 26(a)(2) and (b)(4).

Dated: July 13, 2021

**THOMAS & SOLOMON LLP**

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